

# DEFENSE NUCLEAR FACILITIES SAFETY BOARD

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John T. Conway, Chairman

Eggenberger, Vice Chairman

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HAND DELIVERED

March 8, 1990

Honorable James D. Watkins  
Secretary of Energy  
Washington, DC 20585

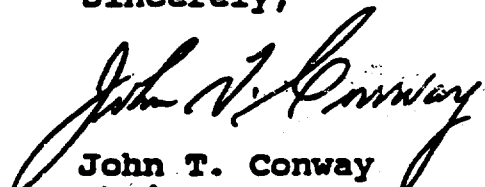
Dear Mr. Secretary:

On March 8, 1990, the Defense Nuclear Facilities Safety Board, in accordance with Section 312(5) of Public Law 100-456, approved a number of recommendations which are enclosed for your consideration.

Section 315(A) of Public Law 100-456 requires the Board, after receipt by you, to promptly make these recommendations available to the public in the Department of Energy's regional public reading rooms. Please arrange to have these recommendations placed on file in your regional public reading rooms as soon as possible.

The Board will publish these recommendations in the Federal Register.

Sincerely,

  
John T. Conway  
Chairman

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Feb. 22, 1990

Enclosure

**RECOMMENDATION TO THE SECRETARY OF ENERGY**  
pursuant to Section 312(5) of the  
Atomic Energy Act of 1954, as amended.

**Dated: March 8, 1990**

As required by the Atomic Energy Act, the Defense Nuclear Facilities Safety Board has begun a review and evaluation of the content and implementation of standards relating to the design, construction, operation and decommissioning of defense nuclear facilities of the Department of Energy (DOE). In its initial phases, the Board has concentrated its efforts on evaluating the adequacy of DOE Orders and Draft DOE Orders as they apply to health and safety aspects of defense nuclear activities at the Savannah River Site and associated Orders which have been issued by DOE's Savannah River Operations Office. To date, the Board's review has preliminarily addressed the content of these Orders. The review has not yet extended to implementation. Also, the Board is not certain that it has seen all applicable DOE standards as they apply to health and safety at the Savannah River Site.

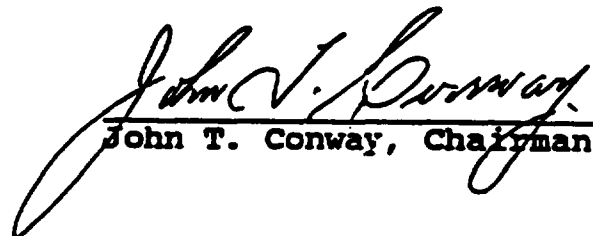
The results of the Board's review to date indicate a large degree of variability in the level of detail specified by such Orders and, in general, a level of specificity much less than is found in Nuclear Regulatory Commission requirements applied to commercial nuclear facilities. The Board has found further that there is a lack of uniformity among such Orders as to whether they are mandatory, non-mandatory, or referenced for information. In addition, the review also has disclosed that a number of DOE Orders embodying safety requirements are in draft form, with substantial uncertainty as to when or in what form they will be issued.

In view of the foregoing and other information relating to DOE Orders provided by the Department, the Board recommends the following:

- o That the Department identify the specific standards which it considers apply to the design, construction, operation and decommissioning of defense nuclear facilities of the Department of Energy (including all applicable Department Orders, regulations, and requirements) at the following defense nuclear facilities as follows:
  - Savannah River Site: K, L, and P Reactors
  - Rocky Flats Plant: Buildings 371, 374, 559, 707, 771, 774, 776, 777 and 779

- Hanford Site: Plutonium Finishing Plant; Purex Facility, together with associated waste processing and storage facilities; N-Reactor (including decommissioning); and K-Reactor Storage Basins
- Waste Isolation Pilot Plant.
- o That the Department provide its views on the adequacy of the standards identified in the above process for protecting public health and safety at the defense nuclear facilities referred to, and determine the extent to which the standards have been implemented at these facilities.

We believe it is necessary for the Department eventually to accomplish the above for each defense nuclear facility under its jurisdiction. The facilities enumerated in these recommendations are those which the Board understands to be among those which have high priority within the Department and on which the Board has focused its attention.

  
John T. Conway, Chairman